

EXHIBIT C

Proposed Curative Instruction re Collateral Estoppel

Members of the jury, in the testimony that was just given by Mr. Trump, Mr. Trump made a statement that implied that Mr. Trump did not sexually assault Ms. Carroll or defame her when he denied doing so.

I'm directing that the testimony be stricken from the record and that you completely disregard it.

As I instructed you at the outset of this case, a jury of nine individuals previously sat for over two weeks, heard testimony from eleven witnesses, and determined that Mr. Trump knew Ms. Carroll, that Mr. Trump sexually assaulted Ms. Carroll, and that Mr. Trump defamed Ms. Carroll when he later denied that he had sexually assaulted her. As a matter of law—pursuant to the oaths that each of you swore as jurors in this case—you **must** accept that Mr. Trump's June 2019 statements were defamatory and false, and that Mr. Trump knew they were false or acted with reckless disregard as to whether they were false when he made them. There is no dispute about these facts. They have been established as true as a matter of law. And so you are required to accept these facts as true for purposes of this case and your deliberations.

Mr. Trump understands that these facts are proven as true, that these facts are not and cannot be disputed by him in this court of law, and that the prior jury unanimously found him liable on Ms. Carroll's claims of sexual assault and defamation. The testimony that Mr. Trump just gave was therefore not only false, but in violation of this Court. Again, you must disregard Mr. Trump's false testimony completely, other than to the extent that his false testimony may affect your evaluation of Mr. Trump's credibility as a witness.